

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PETROHAWK ENERGY CORPORATION, §

Plaintiff, §

vs. §

CIVIL ACTION NO. 4:06-CV-00117

ROBERT J. BENSH, §

Defendant. §

**PLAINTIFF'S INITIAL DISCLOSURES**

Plaintiff, Petrohawk Energy Corporation, makes this, its Initial Disclosures, in accordance with Federal Rule of Civil Procedure 26(a):

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment, identifying the subjects of the information.

ANSWER:

Robert J. Bensch  
c/o Paul Zoeller  
Kasowitz, Benson, Torres & Friedman LLP  
700 Louisiana Street, Suite 2200  
Houston, Texas 77002  
(713) 220-8800

Mr. Bensch is the Defendant in this action, and he has knowledge of his wrongful acts and misrepresentations.

Shane Bayless  
Executive Vice President – Chief Financial Officer and Treasurer  
Petrohawk Energy Corporation  
1100 Louisiana, Suite 5600  
Houston, Texas 77002  
(832) 204-2727

Mr. Bayless has knowledge of the amount of excess consideration paid by Petrohawk for its acquisition of Mission Resources Corporation as a result of Defendant's acts.

George "Chip" Miller

Account Executive  
Stadium Capital  
17985 Village Office Court  
Bend, Oregon 977902

Mr. Miller was formerly an account executive with Jefferies & Co. and may have had some involvement in opening the Bellwether Account that was ultimately acquired by Petrohawk.

Tommy Chang  
Margins Clerk  
Jefferies & Co.  
c/o Kevin T. Rover  
Morgan, Lewis & Bockius LLP  
101 Park Avenue  
New York, New York 10178  
(212) 309-6000

Mr. Chang received the written instruction from Defendant that claimed ownership of the account. Mr. Chang also made the transfer of shares to Defendant.

2. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

ANSWER:

See documents attached bearing Bates numbers PETROHAWK 00001 – PETROHAWK 00212.

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

ANSWER:

Plaintiff is entitled to a recovery based upon the following alternative measures of damages:

Defendant stole 218,800 shares of Mission's Treasury Stock and sold them into the open market. Petrohawk, both for itself and as successor to Mission, is entitled to recover \$1,810,613.76 as the damages for that conversion, measured by the amount paid by Petrohawk to recover those Treasury Shares in the open market. In the alternative, Bellwether, predecessor to Mission and Petrohawk, paid \$1,347,775 when it initially acquired those Treasury Shares. Finally, Defendant sold the stolen Treasury Stock for \$560,160.13.

Petrohawk is also entitled to recover punitive damages.

4. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

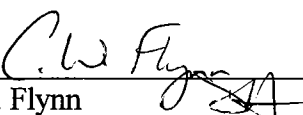
**ANSWER:**

See attached PETROHAWK 00213 – PETROHAWK 00266.

Dated April 27, 2007.

Respectfully submitted,

LOCKE LIDDELL & SAPP, LLP

By:   
C. W. Flynn  
Southern District # 14401  
State Bar No. 07196580  
2200 Ross Avenue, Suite 2200  
Dallas, TX 75201  
(214) 740-8000 (Telephone)  
(214) 740-8800 (Fax)

**ATTORNEY IN CHARGE FOR PLAINTIFF  
PETROHAWK ENERGY CORPORATION**

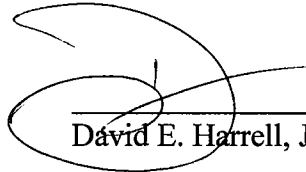
**OF COUNSEL:**

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Southern District 19392  
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3400 JPMorgan Chase Tower  
600 Travis Street  
Houston, Texas 77002-3095  
(713) 226-1200 (Telephone)  
(713) 223-3717 (Fax)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of Plaintiff's Initial Disclosures has been served upon the following counsel of record in accordance with the Federal Rules of Civil Procedure on this the **27th** day of April, 2007.

Dan J. Schulman Salans 620 Fifth Avenue New York, New York 10020 Telephone: (212) 632-8036 Facsimile: (212) 307-3322	Douglas M. Coulson Kasowitz Benson Torres & Friedman, LLP 700 Louisiana, Suite 2200 Houston, Texas 77002 Telephone: (713) 220-8800 Facsimile: (713) 222-0843
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David E. Harrell, Jr.